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Attorneys for Defendant Clayeo C. Arnold APC

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

In re:

THE PILL CLUB PHARMACY HOLDINGS,
LLC, *et al.*,¹

Debtors.

THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS,

Plaintiff,

v.

CLAYEO C. ARNOLD APLC,
Defendant.

Chapter 11

Case No. 23-41090 (ELM)

(Jointly Administered)

Adv. Pro. No. 23-04092-elm

**AGREED MOTION FOR
CONTINUANCE OF DOCKET CALL**

¹ The debtors in these chapter 11 cases (collectively, the “Debtors”), along with the last four digits of each Debtor’s federal tax identification number, are: (i) Hey Favor, Inc. (3206) (ii) The Pill Club Pharmacy Holdings, LLC (0112); (iii) MedPro Pharmacy, LLC (1138); (iv) MobiMeds, Inc. (3165); (v) FVR Medical Group, Inc. (6320); (vi) FVR Medical Group of New Jersey, PC (2934); (vii) FVR Medical Group of Kansas, PA (5449); and (viii) FVR Medical Group of Texas, PA (6479). The service address for the Debtors is: 411 Borel Avenue, San Mateo, CA 94402.

Comes now Clayeo C. Arnold APC, incorrectly named as Clayeo C. Arnold APLC (“Defendant”) and files this Agreed Motion for Continuance of Docket Call (the “Motion for Continuance”), and in support therefor, respectfully represents:

1. Clayeo C. Arnold APC is the defendant in the above-referenced and styled adversary proceeding (the “Adversary Proceeding”) filed in this jointly administered bankruptcy case (the “Bankruptcy Case”).

2. A Status Conference was held in the Adversary Proceeding on Monday, February 5, 2024, at 1:30 p.m. before this Honorable Court. Counsel for the Official Committee of Unsecured Creditors (the “Committee”) appeared at the Status Conference and announced that prior to the scheduled Status Conference that the parties had commenced settlement discussions, by and through counsel, and are in the process of exchanging settlement proposals. The parties have both acted in good faith, and while they have not yet reached an agreement as to the merits—or lack thereof—of the pending litigation, the parties and their counsel agree that justice would be best served by allowing them the opportunity to continue their discussions in the hope that this matter can be resolved without the need of further involvement by the Court.

3. Counsel for Defendant has conferred with counsel for the Committee concerning this request and has been informed that the Committee does not object to and, in fact, supports the requested relief.

4. Based on the facts and circumstances described above, and because this continuance is not sought for any untoward purpose of delay, the parties respectfully jointly request a continuance of the Docket Call for at least sixty (60) days and that the setting of the Docket Call, in addition to all attendant deadlines tied to the date of said Docket Call, be continued to a date not earlier than July 8, 2024, and which is convenient to the Court and counsel for the parties.

WHEREFORE, counsel for Defendant prays that the Court will, upon consideration of the premises set forth herein, grant (i) the requested request for a continuance of the Docket Call (and all attendant deadlines in connection therewith) for a minimum period of sixty (60) days from May

6, 2024, and (ii) such other and further relief as the Court may deem appropriate under the circumstances.

DATED this the 15th day of February, 2024.

Respectfully submitted,

/s/ Berry D. Spears

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CERTIFICATE OF CONFERENCE

Counsel for Defendant spoke with counsel for the Committee and confirmed that the Committee has agreed to the relief request and does not oppose the Motion for Continuance.

KELLER BENVENUTTI KIM LLP

/s/ Berry D. Spears

Berry D. Spears

Attorneys for Defendant Clayeo C. Arnold APC

Certificate of Service

The undersigned counsel of record in the above-styled matter hereby certifies that the following parties were served with a copy of this **AGREED MOTION FOR CONTINUANCE** by ECF on this the 15th day of February, 2024:

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/s/ Berry D. Spears

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